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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 11-40493 WJL

**DONALD JOSEPH DI CLEMENTI and
LAURA MICHELLE DI CLEMENTI,

Debtors.**

Chapter 13

**MOTION TO AVOID JUDICIAL LIEN
IMPAIRING EXEMPTION AND NOTICE
OF DEADLINE TO REQUEST A HEARING**

TO: *GCFS, Inc.*

The real property, which is the subject of this motion, is the Debtors' principal place of residence and is located at 26581 Joshua Street, Hayward, CA 94544. On January 13, 2011, GCFS, Inc., caused to be recorded an Abstract of Judgment, number 2011020320, with the Alameda County Recorder's Office in the sum of \$20,378.67, attached hereto as Exhibit A. The lien impairs the Debtors' ability to exempt the real property under C.C.P. §703.140(b)(1).

Debtors hereby move the Court for an order pursuant to 11 U.S.C. Section 522(f)(1)(A) avoiding the lien of GCFS, Inc. on their real property. Debtors are entitled to an order avoiding the lien on the grounds that the lien is a judicial lien which impairs an exemption to which debtors are otherwise entitled.

[illegible]

WHEREFORE, debtors request that an Order be entered avoiding the judicial lien of GCFS, Inc.

/s/ Patrick L. Forte
PATRICK L. FORTE
Attorney for Debtors